

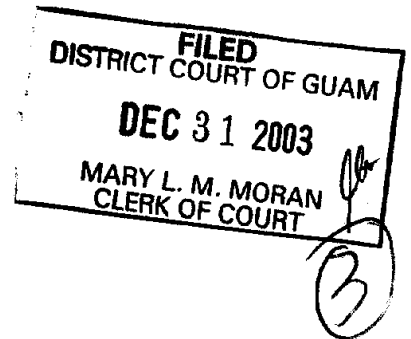
TEKER CIVILLE TORRES & TANG, PLLC

SUITE 200, 330 HERNAN CORTEZ AVENUE

HAGÁTÑA, GUAM 96910

TELEPHONE: (671) 477-9891/472-8868

FACSIMILE: (671) 472-2601/477-2511



Attorneys for Defendants

Citibank, N.A. (Guam) and Patrick Kehres

**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

THOMAS KOICHI NAKAMINE
dba TAKAI'S ENTERPRISE,

Plaintiff,

vs.

CITIBANK, N.A. (GUAM), PATRICK
KEHRES, individually, and DOES 1-10,
inclusive,

Defendants.

CIVIL CASE NO. CV 03-00047

(Superior Court of Guam Civil Case No.
CV2085-03)

**NOTICE OF MOTION AND MOTION
BY CITIBANK, N.A. (GUAM) AND
PATRICK KEHRES FOR ORDER
ISSUING CERTIORARI TO GUAM
SUPERIOR COURT FOR RECORD
IN REMOVED ACTION**

PLEASE TAKE NOTICE that Defendants Citibank, N.A. (Guam) and Patrick Kehres hereby move the Court for an Order issuing a writ of certiorari to the Superior Court of Guam, pursuant to 28 U.S.C. § 1447(b), requiring the Superior Court to bring all records and proceedings in the Superior Court to this Court.

This Motion will be and is based upon this notice, the memorandum of points and authorities filed herewith, and the complete files and records in this action.

DATED at Hagåtña, Guam, this 31st day of December, 2003.

TEKER CIVILLE TORRES & TANG, PLLC


By **G. PATRICK CIVILLE**

Attorneys for Defendants

Citibank, N.A. (Guam) and Patrick Kehres